

The logo for TEC, featuring the letters "TEC" in a bold, white, sans-serif font. To the right of the letters is a stylized, light gray circular graphic that resembles a partial ring or a stylized "C".

ELECTRONICALLY FILED

Friday, November 19, 2021

TR2136089

ALABAMA PUBLIC SERVICE COMMISSION

WALTER L. THOMAS, JR., SECRETARY

November 15, 2021

Mr. Walter L. Thomas, Jr.
Secretary – Alabama Public Service Commission
RSA Union Building, Suite 850
100 North Union St
Montgomery, Alabama 36130-4260

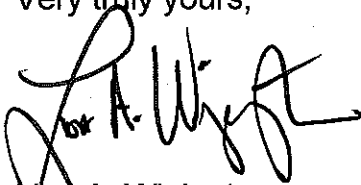
Re: Docket 29878

Dear Mr. Thomas:

In accordance with final Order establishing Requirement for Confidentiality Plans issued by the Commission dated March 14, 2007, we are pleased to enclose the Plan for Confidentiality of Family Violence Shelter Locations for Roanoke Telephone Company, Inc.

Should you need anything further at this time, please let me know.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa A. Wigington". The signature is fluid and cursive.

Lisa A. Wigington,
Vice President of Strategic Operations



November 15, 2021

Mr. Walter L. Thomas, Jr.
Secretary – Alabama Public Service Commission
RSA Union Building, Suite 850
100 North Union St
Montgomery, Alabama 36130-4260

Re: Docket 29878

Dear Mr. Thomas:

In accordance with final Order establishing Requirement for Confidentiality Plans issued by the Commission dated March 14, 2007, we are pleased to enclose the Plan for Confidentiality of Family Violence Shelter Locations for Roanoke Long Distance.

Should you need anything further at this time, please let me know.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa A. Wigington", is written over the typed name.

Lisa A. Wigington,
Vice President of Strategic Operations

**BEFORE THE
ALABAMA PUBLIC SERVICE COMMISSION**

In re:)

Implementation of 2005 ALA. ACTS 110, the)
Communications Reform Act of 2005,)
ALA. CODE § 37-2A-14(j) (1975 as amended))

Docket No. 29878

**ROANOKE TELEPHONE COMPANY, INC.'S PLAN FOR CONFIDENTIALITY
OF FAMILY VIOLENCE SHELTER LOCATIONS**

Roanoke Telephone Company, Inc. hereby files the following Plan for Confidentiality of Family Violence Shelter locations in compliance with ALA. CODE § 37-2A-14(j) (1975 as amended):

Domestic Violence Policy

The purpose of this policy is to protect the confidentiality of the physical location or physical address of "family violence shelters". A "family violence shelter" is a facility that provides services or shelter to adult victims of family violence and their accompanying children.

A. IDENTIFICATION OF SHELTERS:

1. CERTIFIED "FAMILY VIOLENCE SHELTERS"

Roanoke Telephone Company, Inc. will utilize a list of the shelters maintained by the Alabama Coalition Against Domestic Violence (ACADV). ACADV "Family Violence Shelters" must be members in good standing with ACADV. The ACADV updates its currently existing list of member shelters as changes are made in membership and will contact Roanoke Telephone Company, Inc. and the Alabama Public Service Commission ("Commission") with updates regarding shelters operating in Alabama. The ACADV list is posted at <http://www.acadv.org/shelterlist.html>.

2. SHELTER SELF-IDENTIFICATION

In addition to use of the Certified Family Violence Shelters List, Roanoke Telephone Company, Inc. relies on self-identification by shelters. Assurance that certified family violence shelter physical location information confidentiality is maintained is enhanced by shelter self-identification. In such instance, Roanoke Telephone Company, Inc. is dependent on the subscriber to provide such information at the time the account is established. Roanoke Telephone Company, Inc. will provide non-ACADV sanctioned shelters identifying themselves as domestic violence shelters with contact information for the ACADV.

B. SPECIAL HANDLING OF SHELTER CUSTOMERS

1. SHELTER VERIFICATION AND SUPPRESSION

Roanoke Telephone Company, Inc. will conduct a shelter database verification in accordance with the procedures prescribed in A.1. on a quarterly basis. Roanoke Telephone Company, Inc. will use this information to designate all certified family violence shelter physical location information confidential and not for publication or dissemination. The confidentiality of the physical location of certified shelters will be accomplished by means of coding this information such that it is suppressed and not accessible except by that employee(s) trained and authorized to have access to said information.

This designation will include directory publishing, directory assistance, operator services and service account records. This designation shall not apply to the telephone numbers for shelters (i.e., crisis line numbers) or the mailing address (i.e., Post Office Box) when different from the physical location address. An employee(s) will be designated and trained for the purpose of this function.

2. SHELTER PLAN IMPLEMENTATION

In the event Roanoke Telephone Company, Inc. determines that a certified family violence shelter is not in the certificated service area of Roanoke Telephone Company, Inc., those aspects of the Plan related to service orders, installation and repair and other functions related to the physical location of a customer will not be applicable. Nevertheless, Roanoke Telephone Company, Inc. will continue to run the verification test as prescribed above. In the event it is determined that a shelter has been certified in the Company's certificated service area, this will trigger the implementation of those aspects of the Plan applicable to a company with the same.

Concurrently, Roanoke Telephone Company, Inc. will also determine via the verification test if a certified family violence shelter is located in an exchange(s) for which the Company provides directory listings, directory assistance and/or operator services. If it is determined that a shelter has been certified in an exchange for which the Company provides these services, it will trigger the implementation of those aspects of the Plan related to these functions.

C. DIRECTORY PUBLISHING/DIRECTORY ASSISTANCE/OPERATOR SERVICES

Roanoke Telephone Company, Inc. will use a data designation designed to help ensure the suppression of the physical location information for all certified shelters. This will include all data provided for the purpose of service orders, directory publication, directory assistance, operator services and the provision of directory listing data to other telecommunications companies.

Roanoke Telephone Company, Inc. will utilize the information derived from the ACADV database to help ensure that the physical location information suppression procedure described above is accurately implemented. The suppression of the physical location information for all certified family violence shelters will be applicable for all forms of directory information, operator services, online directory services and service records that Roanoke Telephone Company, Inc. offers and has control over.

While it is the intent of this procedure to ensure that the suppressed data is not available to these entities, Roanoke Telephone Company, Inc. will also notify any outside directory publication or operator service company of the requirements of the Communications Reform Act of 2005. Roanoke Telephone Company, Inc. undertakes no responsibility for the actions of these entities or other third parties and, in addition to such limitations which may be set out in Roanoke Telephone Company, Inc.'s tariff, Roanoke Telephone Company, Inc. shall not be liable for any damages to these entities or other third parties either directly or indirectly, resulting from the disclosure of customer information, incorrect calls, blocked calls, fraudulent calls, unauthorized calls or technical difficulties.

D. EMPLOYEE ACCESS TO CONFIDENTIAL INFORMATION

Roanoke Telephone Company, Inc. will designate an employee(s) who will be responsible for the implementation of this Plan and will provide contact information for such designated individual(s) to the Commission, which will then be submitted to the ACADV. To the extent an employee(s) is designated as responsible for any aspect of this Plan, they will be trained with respect to the confidentiality of information related to the physical location of certified family violence shelters, including instructions not to provide any proprietary information to persons with whom they interact unless the person's identity has been authenticated and there is a valid business reason for providing the requested information. Said designated employee(s) will also be trained with respect to awareness of related issues and sensitivity. Only those employees specifically designated and trained will be authorized to have access to information regarding the physical location of these shelters. The employee(s) so designated should be the same employee(s) referenced in B.1. and who will perform the functions prescribed in A.1. Roanoke Telephone Company, Inc. will provide all updates to contact information for these designated employees in the same manner that it provides initial contact information to the Commission.

E. BUSINESS OFFICE AND CUSTOMER CONTACT PROCEDURES

1. BUSINESS OFFICE PROCEDURES

The data suppression procedure is designed to ensure that non-designated employees do not have access to the physical location information for certified family violence shelters. In the event an employee in the business office, installation and

repair, directory listing, operator services or other area of the company encounters a suppression designation, they will have been trained to immediately contact the employee in the company designated to be responsible for the implementation of the Plan.

2. CUSTOMER CONTACT PROCEDURES

Certified shelter accounts will be suppressed from all outbound sales efforts, whether via telephone, direct mail, internet or otherwise. Without limitation, all such accounts will be suppressed from any customer list available for dissemination to any third party.

F. If, despite the procedures set forth in this Plan, Roanoke Telephone Company, Inc. discovers that there is a disclosure, in any form, of the physical location or address of a certified family violence shelter, Roanoke Telephone Company, Inc. will:

1. Notify the shelter by telephone as soon as possible, but not later than 24 hours after such discovery;
2. Notify that Alabama Coalition on Domestic Violence by telephone as soon as possible, but not later than 24 hours after such discovery; and
3. Provide written notice to the Alabama Public Service Commission no later than seven (7) working days after such discovery.

This document reflects those procedures in place as of the date reflected herein and is subject to change by Roanoke Telephone Company, Inc. without further notice. The procedures outlined herein are subject to applicable federal and state laws and regulations, as well as applicable tariffs. In addition to such limitations which may be set out in Roanoke Telephone Company, Inc.'s tariff, Roanoke Telephone Company, Inc. shall not be liable for any damages caused to subscribers either directly or indirectly, resulting from the disclosure of customer information, incorrect calls, blocked calls, fraudulent calls, unauthorized calls or technical difficulties.

Respectfully submitted this 15TH day of November 2021.

ROANOKE TELEPHONE COMPANY, INC.



Lisa Wigginton
Vice President of Strategic Operations

**BEFORE THE
ALABAMA PUBLIC SERVICE COMMISSION**

In re:)	
)	
Implementation of 2005 ALA. ACTS 110, the)	Docket No. 29878
Communications Reform Act of 2005,)	
ALA. CODE § 37-2A-14(j) (1975 as amended))	

**ROANOKE LONG DISTANCE'S PLAN FOR CONFIDENTIALITY
OF FAMILY VIOLENCE SHELTER LOCATIONS**

Roanoke Long Distance hereby files the following Plan for Confidentiality of Family Violence Shelter locations in compliance with ALA. CODE § 37-2A-14(j) (1975 as amended):

Domestic Violence Policy

The purpose of this policy is to protect the confidentiality of the physical location or physical address of "family violence shelters". A "family violence shelter" is a facility that provides services or shelter to adult victims of family violence and their accompanying children.

A. IDENTIFICATION OF SHELTERS:

1. CERTIFIED "FAMILY VIOLENCE SHELTERS"

Roanoke Long Distance will utilize a list of the shelters maintained by the Alabama Coalition Against Domestic Violence (ACADV). ACADV "Family Violence Shelters" must be members in good standing with ACADV. The ACADV updates its currently existing list of member shelters as changes are made in membership and will contact Roanoke Long Distance and the Alabama Public Service Commission ("Commission") with updates regarding shelters operating in Alabama. The ACADV list is posted at <http://www.acadv.org/shelterlist.html>.

2. SHELTER SELF-IDENTIFICATION

In addition to use of the Certified Family Violence Shelters List, Roanoke Long Distance relies on self-identification by shelters. Assurance that certified family violence shelter physical location information confidentiality is maintained is enhanced by shelter self-identification. In such instance, Roanoke Long Distance is dependent on the subscriber to provide such information at the time the account is established. Roanoke Long Distance will provide non-ACADV sanctioned shelters identifying themselves as domestic violence shelters with contact information for the ACADV.

B. SPECIAL HANDLING OF SHELTER CUSTOMERS

1. SHELTER VERIFICATION AND SUPPRESSION

Roanoke Long Distance will conduct a shelter database verification in accordance with the procedures prescribed in A.1. on a quarterly basis. Roanoke Long Distance will use this information to designate all certified family violence shelter physical location information confidential and not for publication or dissemination. The confidentiality of the physical location of certified shelters will be accomplished by means of coding this information such that it is suppressed and not accessible except by that employee(s) trained and authorized to have access to said information.

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2. SHELTER PLAN IMPLEMENTATION

In the event Roanoke Long Distance determines that a certified family violence shelter is not in the certificated service area of Roanoke Long Distance, those aspects of the Plan related to service orders, installation and repair and other functions related to the physical location of a customer will not be applicable. Nevertheless, Roanoke Long Distance will continue to run the verification test as prescribed above. In the event it is determined that a shelter has been certified in the Company's certificated service area, this will trigger the implementation of those aspects of the Plan applicable to a company with the same.

Concurrently, Roanoke Long Distance will also determine via the verification test if a certified family violence shelter is located in an exchange(s) for which the Company provides directory listings, directory assistance and/or operator services. If it is determined that a shelter has been certified in an exchange for which the Company provides these services, it will trigger the implementation of those aspects of the Plan related to these functions.

C. DIRECTORY PUBLISHING/DIRECTORY ASSISTANCE/OPERATOR SERVICES

Roanoke Long Distance will use a data designation designed to help ensure the suppression of the physical location information for all certified shelters. This will include all data provided for the purpose of service orders, directory publication, directory assistance, operator services and the provision of directory listing data to other telecommunications companies.

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described above is accurately implemented. The suppression of the physical location information for all certified family violence shelters will be applicable for all forms of directory information, operator services, online directory services and service records that Roanoke Long Distance offers and has control over.

While it is the intent of this procedure to ensure that the suppressed data is not available to these entities, Roanoke Long Distance will also notify any outside directory publication or operator service company of the requirements of the Communications Reform Act of 2005. Roanoke Long Distance undertakes no responsibility for the actions of these entities or other third parties and, in addition to such limitations which may be set out in Roanoke Long Distance's tariff, Roanoke Long Distance shall not be liable for any damages to these entities or other third parties either directly or indirectly, resulting from the disclosure of customer information, incorrect calls, blocked calls, fraudulent calls, unauthorized calls or technical difficulties.

D. EMPLOYEE ACCESS TO CONFIDENTIAL INFORMATION

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Respectfully submitted this 15th day of November 2021.

ROANOKE LONG DISTANCE



Lisa Wigington
Vice President of Strategic Operations